

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION**

DOUGLAS HANDSHOE

PLAINTIFF

VERSUS

CIVIL ACTION NO: 1:13CV251 LG JMR

**AARON F. BROUSSARD, DANIEL ABEL,
CHARLES LEARY, VAUGHN PERRET,
CHRIS YOUNT, TROUT POINT LODGE
LIMITED, NOVA SCOTIA ENTERPRISES, LLC**

DEFENDANTS

DEFENDANT NOVA SCOTIA ENTERPRISES, LLC'S RESPONSE TO PLAINTIFF'S
MOTION TO STRIKE DEFENDANT NOVA SCOTIA ENTERPRISES LLC'S ANSWER AS
NOT BEING FILED TIMELY BY A LICENSED MEMBER OF THE MISSISSIPPI BAR
ADMITTED TO PRACTICE IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF MISSISSIPPI AND TO ADMONISH RONALD VEGA TO
COMPLY WITH MISSISSIPPI'S LAW REGARDING THE PRACTICE OF LAW WITHOUT
A LICENSE

1.

Plaintiff has alleged that Ronald J. Vega filed various documents in connection with the above captioned matter on behalf of Nova Scotia Enterprises, LLC as its attorney. Those documents were filed Pro Se. Plaintiff also alleges that Ronald J. Vega ignored a letter dated June 24, 2013 from the Clerk of Court in this Honorable Court. Upon receipt of said letter, Ronald J. Vega contacted the United States District Court Office of the Clerk, Southern District of Mississippi in Jackson, Mississippi as well as the Gulfport Division, whereby he was informed that the pleadings had in fact have been filed as Pro Se. Ronald J. Vega did not ignore the letter dated June 24, 2013.

2.

Since that time, Ronald J. Vega has been able to associate an attorney who is a member of the Bar of this Honorable Court, said Motion being filed on August 8, 2013. (Docket No. 40).

3.

On August 9, 2013, by Text Order only, the Court found that the Motion of Ronald J. Vega be admitted Pro Hac Vice on behalf of Nova Scotia Enterprises, LLC, should be granted in association with local counsel upon payment of the appropriate fee and registration for electronic filing as required by the Uniform Local Rules of this Court. No further written order shall be issued by this Court. On August 12, 2013, this Court noted that the Pro Hac Vice fee of \$100 was paid.

4.

On August 14, 2013, Ronald J. Vega registered for the electronic filing.

5.

Ronald J. Vega did not sign any of the pleadings as attorney for Nova Scotia Enterprises, LLC. Ronald J. Vega was not trying to practice law before this Honorable Court without a license. All pleadings were filed Pro Se. Now that Ronald J. Vega has complied with the local rules of this Honorable Court, he will be signing this pleading and all future pleadings as attorney Pro Hac Vice, along with local counsel in this matter, on behalf of Nova Scotia Enterprises, LLC.

CONCLUSION

For the foregoing reasons, Defendant, Nova Scotia Enterprise, LLC, respectfully requests that this Honorable Court deny Plaintiff's Motion To Strike Defendant Nova Scotia Enterprises LLC's Answer As Not Being Filed Timely By A Licensed Member Of The Mississippi Bar

Admitted To Practice In The United States District Court For The Southern District Of Mississippi And To Admonish Ronald Vega To Comply With Mississippi's Law Regarding The Practice Of Law Without A License.

Respectfully Submitted

s/ Craig J. Geraci, Jr.

CRAIG J. GERACI, JR.

Mississippi Bar # 103268

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*Local Counsel for Nova Scotia
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s/ Ronald J. Vega

RONALD J. VEGA

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*Attorney Pro Hac Vice for Nova Scotia
Enterprises, LLC*

CERTIFICATE OF SERVICE

The undersigned Applicant certifies that a copy of this Defendant's Response To Plaintiff's Motion To Strike Defendant Nova Scotia Enterprises LLC's Answer As Not Being Filed Timely By A Licensed Member Of The Mississippi Bar Admitted To Practice In The United States District Court For The Southern District Of Mississippi And To Admonish Ronald Vega To Comply With Mississippi's Law Regarding The Practice Of Law Without A License has been mailed or otherwise served on this date on all parties who have appeared in this case:

Douglas Handshoe
214 Corinth Drive
Bay St. Louis, Mississippi 39520

Chris Yount
160 Metairie Lawn Drive
Metairie, LA 70001

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This the 14th day of August, 2013.

s/ Ronald J. Vega
RONALD J. VEGA